



575 Madison Avenue  
New York, NY 10022-2585  
212.940.8800 office 212.940.8776 fax

**MICHAEL S. GORDON**  
michael.gordon@kmzr.com  
212.940.6666 212.894.5966 fax

July 21, 2003

**By Electronic Filing**

Honorable J. Frederick Motz  
United States District Judge  
District of Maryland  
United States Courthouse  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: (1) PracticeWorks, Inc., et al. v. Professional Software  
Solutions of Illinois, Inc., Civil No. JFM-02-1205  
  
(2) Practice Works, Inc., et al. v. Dental Medical  
Automation, Inc., Civil No. JFM-02-1206

Dear Judge Motz:

We represent Plaintiffs PracticeWorks, Inc. and SoftDent, LLC ("Plaintiffs") in the above-referenced matters. We make a joint request with counsel for Defendants Professional Software Solutions of Illinois, Inc. and Dental Medical Automation, Inc. ("Defendants") regarding the enclosed Stipulation containing a proposed briefing schedule for the parties' respective applications for leave to amend their pleadings.

On June 10, Defendants filed their Motion for Leave to File First Amended Counterclaims in the above-referenced actions to assert a Seventh Counterclaim for declaratory relief regarding Defendants' ability to provide technical support and service and to assert Tenth and Eleventh Counterclaims for tortious interference with contract and tortious interference with prospective economic advantage, respectively. In addition to opposing Defendants' application for leave to amend, Plaintiffs seek to amend their Complaint to assert claims that are essentially the converse of Defendants' proposed amended Counterclaims, *i.e.*, a Fourth Count for breach of contract and a Fifth Count for copyright infringement.

After counsel recently met and conferred regarding these motions for leave to amend the pleadings pursuant to Local Rule 103.6.d, it was agreed, in the interests of case management and litigation efficiency, that on July 21, 2003, Defendants would withdraw their Motion for Leave to File First Amended Counterclaims and would re-file said Motion on July 28 in compliance with Local Rule 103.6.

It further was agreed, as memorialized in the enclosed Stipulation that, pending the Court's approval, (i) on August 11, 2003, Plaintiffs would file their opposition to Defendants' Motion for Leave to File First Amended Counterclaims and Plaintiffs also would file their Cross-

Honorable J. Frederick Motz  
July 21, 2003  
Page 2

**KMZ**Rosenman  
KATTEN MUCHIN ZAVIS ROSENMAN

Motion for Leave to File a First Amended Complaint; (ii) on August 25, 2003, Defendants would file their reply papers in further support of their Motion and any opposition to Plaintiffs' Cross-Motion; and (iii) on September 8, 2003, Plaintiffs would file their reply papers in further support of their Cross-Motion.

For all the foregoing reasons, the parties respectfully request that the Court approve the enclosed Stipulation.

Respectfully submitted,

/s/ Michael S. Gordon

Michael S. Gordon

MSG:jpb

cc: Howard E. Cotton (Plaintiffs' counsel)  
Mark E. Wiemelt, Esq. (Defendants' counsel)  
John M.G. Murphy, Esq. (Defendants' counsel)